

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,
OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, OPENAI HOLDINGS,
LLC,

Defendants.

No. 1:23-cv-11195-SHS-OTW

**MOTION TO WITHDRAW ALLYSON R. BENNETT AS COUNSEL FOR
DEFENDANTS OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,
OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, AND
OPENAI HOLDINGS, LLC**

PLEASE TAKE NOTICE THAT, Morrison & Foerster LLP hereby moves this court for an order pursuant to Local Civil Rule 1.4, relieving Allyson R. Bennett as counsel for Defendants OpenAI, Inc., OpenAI, LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC (collectively, “OpenAI”) in the above-captioned action on the grounds that she is no longer an attorney with Morrison & Foerster LLP, and respectfully requests that she be removed from the CM/ECF noticing list and any other service list in this case.

PLEASE TAKE FURTHER NOTICE The undersigned counsel from Morrison & Foerster LLP will continue to represent Defendants OpenAI, Inc., OpenAI, LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC.

Dated: September 19, 2024

MORRISON & FOERSTER LLP

By: /s/ Joseph C. Gratz

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OAI CORPORATION, LLC, and
OPENAI HOLDINGS, LLC

CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2024 the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing to the attorneys of record in this case.

/s/ Joseph C. Gratz
JOSEPH C. GRATZ